

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

**KEYPOINT GOVERNMENT
SOLUTIONS, INC.**

Plaintiff,

v.

MICHAEL C. MCGINN,

Defendant.

No. 1:17-CV-00899-LO-TCB

**MEMORANDUM OF POINTS AND AUTHORITIES IN SUPPORT OF CONSENT
MOTION FOR ENTRY OF AGREED PRELIMINARY INJUNCTION**

Plaintiff KeyPoint Government Solutions, Inc. (“Plaintiff”), with consent of Defendant Michael C. McGinn (“Defendant”), hereby submits its Memorandum of Points and Authorities in Support of its Consent Motion for Entry of Agreed Preliminary Injunction. In support of this Motion, Plaintiff states as follows:

1. On August 8, 2017, Plaintiff filed its Verified Complaint for Temporary Restraining Order, Preliminary and Permanent Injunctive Relief, and Other Relief in this Court. In the Verified Complaint, Plaintiff asserts causes of action for: (1) misappropriation of trade secrets; and (2) conversion, and seeks injunctive relief and other appropriate relief.

2. On August 9, 2017, Defendant served Plaintiff with its Verified Complaint.

3. On August 10, 2017, Plaintiff filed its Emergency Motion for Temporary Restraining Order and Preliminary Injunction. This Motion requested that the Court issue a Temporary Restraining Order and Preliminary Injunction that enjoins Defendant from, among other things, using, disclosing, or otherwise possessing any trade secrets or confidential information belonging to KeyPoint or any of its clients

4. On August 17, 2017, the parties submitted a Consent Motion for Agreed Temporary Restraining Order, and a Memorandum in Support of the Motion.

5. On August 18, 2017, the Court entered the Temporary Restraining Order.

6. Counsel for Plaintiff, and Counsel for Defendant have since reached a consensus on an Agreed Preliminary Injunction (“Agreed Order”). As such, Plaintiff respectfully requests that the Court grant its Consent Motion for Entry of Agreed Preliminary Injunction and enter the Agreed Order submitted herewith.

7. Plaintiff also requests that the Agreed Order shall continue in full force and effect until modified by the Court.

8. Plaintiff further requests that the Court remove from the court’s docket the hearing on Plaintiff’s Emergency Motion for Preliminary Injunction, currently scheduled for Friday, September 1, 2017.

9. The Agreed Order is attached herein for the Court’s review and entry.

WHEREFORE, for the reasons stated herein, Plaintiff requests that the Court grant its Consent Motion for Entry of Agreed Preliminary Injunction.

Date: August 30, 2017.

Respectfully submitted,

/s/ Joon Hwang

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*Attorneys for Plaintiff KeyPoint Government
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CERTIFICATE OF SERVICE

The undersigned certifies that on this 30th day of August 2017, a true and correct copy of the foregoing *Memorandum of Points and Authorities in Support of Consent Motion for Entry of Agreed Preliminary Injunction* was filed via the CM/ECF, which will send an electronic notification to:

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